

Craig C. Daniel (State Bar No. 212588)  
 GLUCK DANIEL ATKINSON LLP  
 201 Mission Street, Suite 1330  
 San Francisco, CA 94105  
 Telephone: (415) 510-2509  
 Email: litigation@gluckdaniel.com

Angela J. Somers (admitted *pro hac vice*)  
 Jeffrey E. Gross (admitted *pro hac vice*)  
 Minyao Wang (admitted *pro hac vice*)  
 REID COLLINS & TSAI LLP  
 420 Lexington Avenue, Suite 2731  
 New York, NY 10170  
 Telephone: (212) 344-5200  
 Facsimile: (212) 344-5299  
 Email: asomers@reidcollins.com  
 jgross@reidcollins.com  
 mwang@reidcollins.com

*Counsel for Plaintiffs Cedric de Lisser,  
 Christopher Moser, and Michael Michelin, in  
 their capacity as the Trustees of the Cred  
 Liquidation Trust*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

CEDRIC DE LISSER, CHRISTOPHER MOSER, )  
 and MICHAEL MICHELIN, in their capacity as )  
 the Trustees of the Cred Liquidation Trust, )  
 Plaintiffs, )  
 v. )

LOCKTON COMPANIES LLC, d/b/a )  
 LOCKTON INSURANCE BROKERS LLC, )  
 a Missouri limited liability company; LOCKTON )  
 COMPANIES, LLC- PACIFIC SERIES, d/b/a )  
 LOCKTON INSURANCE BROKERS LLC, a )  
 Missouri limited liability company; and DOES 1- )  
 10, inclusive. )  
 Defendants. )

Case No. 3:23-cv-00243-JD

**[Removal from Superior Court of California,  
 County of San Francisco, Case No.  
 CGC-22603638]**

**PLAINTIFFS' CERTIFICATION OF  
 CONFLICTS AND INTERESTED  
 ENTITIES OR PERSONS**

**State Action Filed: December 22, 2022**

**CERTIFICATION PURSUANT TO CIVIL LOCAL RULE 3-15**

Pursuant to Civil Local Rule 3-15, Cedric De Lisser, Christopher Moser, and Michael Michelin, in their capacity as the Trustees (the “Trustee”) of the Cred Liquidation Trust (the “Trust”), certify that as of this date and to the best of their knowledge, there is no conflict to report. The Trustees further state that the Trust is being administered by Mr. de Lisser, Mr. Moser and Mr. Michelin as Trustees. In addition, Kyle Wang, Jamie Shiller, and Eric Schurman comprise an advisory board to the Trust. Moreover, the Trust Assignors (as such term is defined in the Trustee’s First Amended Complaint (ECF No. 14-1)) are Charles Lee, Chi King Wu, Christopher Moser, Gunther Baugh, Joseph Shull, Julius Hudec, Koji Kanie, Kyle Wang, Olatunde Lapido, Patrick Archambeau, Robin Houck and Teppei Miyauchi.

The Trustees submit that the foregoing disclosure is adequate to satisfy Civil Local Rule 3-15.

Dated: March 1, 2023

Respectfully submitted,

/s/ Craig C. Daniel

---

Craig C. Daniel (State Bar No. 212588)  
**GLUCK DANIEL ATKINSON LLP**  
 201 Mission Street, Suite 1330  
 San Francisco, CA 94105  
 Telephone: (415) 510-2509  
 Email: litigation@gluckdaniel.com

-and -

Angela J. Somers (admitted *pro hac vice*)  
 Jeffrey E. Gross (admitted *pro hac vice*)  
 Minyao Wang (admitted *pro hac vice*)  
**REID COLLINS & TSAI LLP**  
 420 Lexington Avenue, Suite 2731  
 New York, NY 10170  
 Telephone: (212) 344-5200  
 Facsimile: (212) 344-5299  
 Email: asomers@reidcollins.com  
 jgross@reidcollins.com  
 mwang@reidcollins.com

*Counsel for Plaintiffs Cedric de Lisser, Christopher Moser, and Michael Michelin, in their capacity as the Trustees of the Cred Liquidation Trust*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Civil L.R. 5-1 and will be served upon all counsel of record for the parties who have consented to electronic service in accordance with Civil L.R. 5-1 via the Court's ECF System.

Dated: March 1, 2023

By: /s/ Craig C. Daniel  
Craig C. Daniel